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Attorney for Defendant Kevin Kjonaas

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA, : Honorable Mary L. Cooper, U.S.D.J.
Plaintiff, : CRIMINAL NO. 04-373
v. :
STOP HUNTINGDON ANIMAL : NOTICE OF MOTION --
CRUELTY USA, INC., : COPIES OF VIDEOTAPES
KEVIN KJONAAS, a/k/a :
“Kevin Jonas,” a/k/a “Steve :
Shore,” a/k/a “Jim Fareer,” :
LAUREN GAZZOLA, :
a/k/a “Angela Jackson,” a/k/a :
“Danielle Matthews,” :
JACOB CONROY, :
JOSHUA HARPER, :
ANDREW STEPANIAN, :
DARIUS FULLMER, and :
JOHN MCGEE, :
Defendants. :
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To: Clerk of the Court
United States District Court, D.N.J.
Clarkson S. Fisher Federal Building and U.S. Courthouse
402 E. State Street, 5th Floor
Trenton, NJ 08608

Assistant United States Attorney Charles B. McKenna
U.S. Attorney's Office
970 Broad Street, Room 700
Newark, NJ 07102

PLEASE TAKE NOTICE that, on November 19, 2004 at 1 p.m., counsel for Defendant Kevin Kjonaas shall move before the Honorable Mary L. Cooper, U.S.D.J., at the United States Court House, at 402 E. State Street, 5th Floor, Trenton, NJ 08608, for an Order directing the United States Attorney's Office to provide to defense counsel a set of the remaining videotapes seized during the search of 101 Home Street in Somerset, NJ, which are presently available to defense counsel only for on-site viewing at the United States Attorney's Office.

In support of the Motion, Defendant Kjonaas will rely on the letter-brief submitted with this Notice, and on argument of counsel at the hearing on the motion.

Respectfully submitted,

/s/
ISABEL McGINTY, P.C.
162 Broad Street
Hightstown, NJ 08520
(609) 443-0650
Attorney for Defendant Kevin Kjonaas

Dated: November 8, 2004